

February 29, 2024

VIA ECF

The Honorable Jesse M. Furman
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: Jay Alix v. McKinsey & Co., Inc., et al., No. 18-CV-4141(JMF)

Dear Judge Furman:

Pursuant to Rule 7(C) of Your Honor's Individual Rules and Practices in Civil Cases, the Parties in the above-referenced action respectfully request leave to file under seal (i) portions of the joint letter being submitted by the parties pursuant to the Case Management Order in advance of the March 5, 2024 status conference (the "Joint Letter") and (ii) exhibits B through E attached thereto (the "Designated Exhibits"), which are referenced in the Joint Letter. The material to be sealed covers documents marked Confidential or Highly Confidential by Alix or AlixPartners.¹

The Designated Exhibits are as follows:

- Exhibit B: AlixPartners' revised privilege log for its Rule 17 document production;
- Exhibit C: The Assignment at issue, as produced by Alix;
- Exhibit D: Excerpts of the transcript of Jay Alix's February 27, 2024 deposition on Rule 17 issues; and
- Exhibit E: An email exchange produced by Alix.

Pursuant to the Court's rules (at 7(C)(i)), Defendants have notified counsel for Alix and AlixPartners of their need to file letters, within three business days, explaining the need for sealing.

Respectfully submitted,

/s/ Sean F. O'Shea

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¹ Defendants reserve the right to seek relief from the Court with respect to these or other documents.

The Honorable Jesse M. Furman
February 29, 2024

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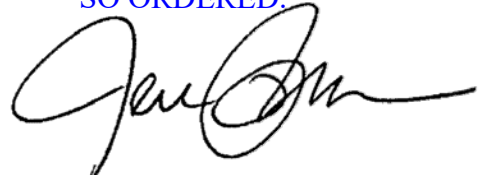
Counsel for Virginia "Jean" Molino

The motion to seal is granted temporarily. The Court will assess whether to keep the documents at issue sealed or redacted when resolving the underlying dispute.

With respect to the discovery disputes raised by Defendants in the parties' joint letter, Alix and AlixPartners shall file any consolidated response, not to exceed three pages, no later than March 4, 2024, at 5 p.m. The parties should also be prepared to discuss the disputes at the March 5, 2024 pretrial conference.

The Clerk of Court is directed to terminate ECF No. 311.

SO ORDERED.



March 1, 2024